IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AGERE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS LLC,

Civil Action No. 02-CV-3830 (LDD)

Plaintiffs,

v.

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,

Defendants.

MOTION FOR LEAVE TO AMEND FOURTH AMENDED COMPLAINT

Plaintiffs Agere Systems, Inc., Cytec Industries Inc., Ford Motor Company, SPS Technologies, LLC, and TI Group Automotive Systems LLC ("Plaintiffs") move this Court, pursuant to Fed. R. Civ. P. 15(a), for leave to amend their Fourth Amended Complaint. For the reasons set forth in the accompanying memorandum of law, Plaintiffs' motion should be granted, and Plaintiffs' Fifth Amended Complaint should be deemed filed and should relate back to the date of the filing of the original Complaint.

Dated: July 25, 2007

Respectfully submitted,

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